

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service
Docket No. MM 99-25

To: Federal Communications Commission (FCC)

Reply Comments of John L. Zolkoske,
President, Cascade Range Radio Corporation
November 10, 1999

These comments are made in reference to Federal Communications Commission (FCC) Notice of Proposed Rulemaking Docket No. MM 99-25. I wish to re-state my support for creation of LPFM service. I wish to respond to some comments I have heard regarding MM 99-25.

Commercial Vs. Non-Commercial Service:

I do not believe that LPFM should be a non-commercial only service as some have proposed. Commercial support should be allowed. Commercial support has been the main method of support for most broadcast stations for over 75 years. If commercial support is excluded, I fear that individuals or small companies will have no legitimate means of support, and LPFM licenses will only go to existing non-profit or educational institutions - many of whom can hardly be considered small business enterprises. This would only serve to diminish the intention of LPFM, which is to foster diversity and create new opportunities for diverse segments of the population.

Certainly there seems to some fear that LPFM could siphon off revenues from existing stations (in particular those that are already marginal). I do not see this happening, as LPFM will generate revenues from alternative sources, namely businesses that do not currently advertise on existing stations due to the cost or lack of targeting to their clientele. If, perhaps, an advertiser not pleased with its current advertising outlet and directs more advertising budget to an LPFM station, this may in itself points to a need for LPFM as a fulfillment of a market demand. I am, however, sensitive to the needs of struggling AM stations. Perhaps some further investigation should be directed at improving the technical standards of the AM band - especially implementation of IBOC (In-Band On-Channel digital broadcasting for AM). But this in itself should not impede development of LPFM.

If the FCC fears loss of too much revenue for existing stations, I reiterate a suggestion from my original comments which is to limit the revenue of LPFM by limiting the amount of commercial material per hour. Something might be initiated as is done with FM-Translators (see CFR 74.1231 subpart g). With LPFM, commercial support should be permissible for commercial stations along with underwriting for non-commercial LPFM's.

Ownership Restrictions:

I have seen comments of support of LPFM from many diverse individuals and groups, from mainstream churches to a senior citizen who dreams of playing "doo-wop" music from the 1950's. In order to allow the greatest degree of diversity, I support the proposal to allow only one LPFM per individual or group licensee. The true spirit of LPFM is not to generate a financial fortunes by building a network of stations, but to provide a service to the community in which each of us live. I continue to support the proposal of Rodger Skinner (original proponent of RM-9242) to limit

ownership to within 50 miles of a licensee's home address. This way, we can be more assured of a program offering which relates to the local area.

Technical Discussion:

I believe power levels allowed should be sufficient to make operation financially feasible - 100 to 1000 watts. I really see no compelling reason to license 1 - 10 watt stations as long as the higher powered LP100 and LP1000 service is authorized - especially from an administrative standpoint (it would be hard to keep track of them all).

After reviewing the receiver studies commissioned by the FCC, I feel it shows that LPFM will cause negligible or no interference to existing broadcasting operations. I have heard opposition to LPFM in the form of concern that it could impede conversion to IBOC (In Band On-Channel Digital Transmission). I do not see this as possible, given that LPFM interference restrictions (as originally proposed) are as strict as for current higher powered stations. Certainly an IBOC system implemented would have to meet interference criteria for existing stations. I will state that I would prefer to see LPFM implemented with current interference restrictions (second and third channel protection) intact, rather than see it delayed while the second third-channel issue is debated. This issue can be re-visited at some later time, when more complete data is compiled.

Summary:

To summarize, I found no compelling reason in the comments I saw that should delay or end the process to establish LPFM. I hope the service will be established, so that those of us who have been waiting many years for an opportunity to make a contribution in the broadcasting industry will achieve our dream - especially in this era of deregulation/consolidation which has shut-out many of us from the industry. I hope the implementation of LPFM will begin as soon as

administratively possible. As this comment period draws to a close, I would like to thank the FCC for allowing me to make my views known throughout this entire process. Thank you for your consideration.

Sincerely,

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CERTIFICATE OF SERVICE

I, John L. Zolkoske, do hereby certify that a true and correct transmission of these "Reply Comments on MM 99-25" was sent via FCC Electronic Comment File Submission System.

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Submitted this 10th day of November, 1999

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